

10/2/2012

Marlene H. Dortch
Secretary
Federal Communications Commission
TW-A325
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Presentation
CC Docket No. 95-155

Dear Ms. Dortch:

On September 20, 2012, David Greenhaus (800 Response), Gregg Hammershlag (Primary Wave), Thomas Hall (ATL Communications), and I (ATL Communications) met with Wireline Competition Bureau; Competition Policy Division: Ann Stevens, Deputy Division Chief, Michelle Sclater, Attorney Advisor, Heather Hendrickson, Attorney Advisor; Front Office: Travis Litman, Legal Advisor; Enforcement Bureau: Sarah Citrin, Assistant Chief, Andra Cunningham, Attorney Advisor, and Shante Willis, Attorney Advisor.

We discussed possible new approaches to the issues surrounding the sale of toll free numbers. A copy of the presentation was distributed during the meeting and is attached here.

I request that this letter, which is filed electronically, be placed in the file for the proceeding referenced above.

Please contact me at 888-217-5784 with any questions.

Sincerely,

Aelea Christofferson

CC: A. Stevens
P. Arluk
H. Hendrickson
M. Sclater
J. May
A. Lewis
L. Gelb

SALE OF NUMBERS



FCC MEETING
SEPTEMBER 20, 2012

HISTORY



Current regulations were designed in the late 1980s:

- ❖ Divestiture had just occurred and there was no competition in the toll-free market
- ❖ The designers did not envision wide-spread competition
- ❖ Local competition was not even imagined

WHERE ARE WE TODAY?



- Changes in the industry and technology advances have made current FCC rules and regulations outdated.
- In twenty years there has been no real success controlling the black market for buying and selling these numbers.
- Result is companies that obey the federal regulation are at a competitive disadvantage.

POTENTIAL SOLUTIONS



- Spend more money and resources to identify and penalize companies buying and selling numbers resulting in higher costs to the tax-payer.

(This is a very lucrative business that will undoubtedly lead to extensive costs to investigate, prosecute and collect.)

OR

- Begin a review of the federal regulations.
- Begin to consider innovation to rectify this current inequality in the system.

AUSTRALIAN MODEL



- Since 2004, Australia has auctioned toll free numbers through the Australian Communications and Media Authority (ACA).
- Result is a win for the Australian government, \$42 million in revenue, and a win for their telecom industry by bringing to toll free:
 - ❖ Transparency
 - ❖ Fair and non-discriminatory process

WHY NOW?



- The 844 prefix for toll free numbers is currently in early plans.
- Using a new prefix to test the auction plan is more realistic than attempting to work with existing prefixes.



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